

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

MISSISSIPPI STATE CONFERENCE OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE; DR.  
ANDREA WESLEY; DR. JOSEPH WESLEY;  
ROBERT EVANS; GARY FREDERICKS; PAMELA  
HAMNER; BARBARA FINN; OTHO BARNES;  
SHIRLINDA ROBERTSON; SANDRA SMITH;  
DEBORAH HULITT; RODESTA TUMBLIN; DR.  
KIA JONES; MARCELEAN ARRINGTON;  
VICTORIA ROBERTSON,

*Plaintiffs,*

vs.

STATE BOARD OF ELECTION COMMISSIONERS;  
TATE REEVES, *in his official capacity as Governor of  
Mississippi*; LYNN FITCH, *in her official capacity as  
Attorney General of Mississippi*; MICHAEL WATSON,  
*in his official capacity as Secretary of State of  
Mississippi*,

*Defendants,*

AND

MISSISSIPPI REPUBLICAN EXECUTIVE  
COMMITTEE,

*Intervenor-Defendant.*

**CIVIL ACTION NO.  
3:22-cv-734-DPJ-HSO-LHS**

**MEMORANDUM IN SUPPORT OF MOTION BY  
DESOTO COUNTY FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN  
SUPPORT OF PLAINTIFFS' OBJECTIONS TO REMEDIAL REDISTRICTING PLANS**

DeSoto County, Mississippi ("DeSoto"), requests leave to file an amicus curiae brief  
objecting to the remedial redistricting plans recently adopted by the Mississippi Legislature.

## ARGUMENT

This Court has “inherent authority to appoint or deny amici which is derived from Rule 29 of the Federal Rules of Appellate Procedure.” *Rowland v. GGNSC Ripley, LLC*, No. 3:13-cv-11, 2016 WL 4136486, at \*4 (N.D. Miss. Aug. 3, 2016) (quoting *Jin v. Ministry of State Sec’y*, 557 F. Supp. 2d 131, 136 (D.D.C. 2008); *see also Republican Nat’l Comm. v. Wetzel*, No. 1:24-cv-25, No. 1:24-cv-37, 2024 WL 988383, at \*5 (S.D. Miss. Mar. 7, 2024). District courts should “look to Federal Rule of Appellate Procedure 29 for guidance concerning the standards for filing an amicus brief.” *Wetzel*, 2024 WL 988383, at \*5. DeSoto respectfully requests the Court grant it leave to submit the attached “brief as an amicus curiae in order to assist the court in reaching a proper decision” on adopting the remedial redistricting plans. *Rowland*, 2016 WL 4136486, at \*4; *see also* Proposed Amicus Curiae Brief, attached as **Exhibit 1**.

## AMICUS CURIAE INTEREST & REASONS FOR THIS BRIEF

DeSoto County is a political subdivision of the State of Mississippi, established to more closely represent, govern, and be accountable to its constituents. This case involves whether Mississippi’s redistricting maps adopted by the Legislature, particularly Senate Districts 1 and 11, are in accordance with traditional constitutional redistricting principles. DeSoto has a significant interest in maintaining constitutional representation for its citizens in the Mississippi Legislature. To achieve this representation, DeSoto has an interest in ensuring that neither Plaintiffs nor Defendants in this case subordinate traditional districting principles to other considerations. *See Alexander v. S.C. State Conf. of NAACP*, 602 U.S. 1, 17 (2024) (quoting *Miller v. Johnson*, 515 U.S. 900, 916 (1995)). When necessary, as is the case here, DeSoto will advocate and defend the constitutional rights of its constituents.

This brief is necessary because the proposed remedial redistricting map (“remedial maps”) adopted by the Mississippi Legislature on March 7, 2025, violates traditional redistricting principles and places DeSoto residents’ representative rights at risk. To be sure, DeSoto County has no doubt that the Legislature created these remedial maps in good faith and without any unlawful motive but in an effort to comply with this Court’s orders. As will be discussed more fully, however, in DeSoto County in particular, the District 1 and District 11 Senate maps dismantle communities of interest, disregard natural geographical boundaries, and distort commonsense cartography. It is apparent from the face of Senate Districts 1 and 11 that the Legislature subordinated these traditional metrics of redistricting, and this amicus curiae brief is necessary to defend traditional districting principles and the rights of DeSoto County’s citizens.

### CONCLUSION

For these reasons, DeSoto County request leave of this Court to file the attached Amicus Curiae Brief in support of Plaintiffs’ objections to the Remedial Redistricting Plan.

Dated: March 14, 2025.

Respectfully submitted,

**PHELPS DUNBAR LLP**

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### CERTIFICATE OF SERVICE

I certify that on March 14, 2025, I electronically filed this document with the Clerk of the Court using the ECF system, which sent notification of such filing to all ECF counsel of record in this action:

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